

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
MULTI ACCESS LIMITED,

Plaintiff,

- against -

GUANGZHOU WANG LAO JI GREAT
HEALTH INDUSTRY CO., LTD. (AKA WLJ
GREAT HEALTH INDUSTRY CO., LTD.);
GUANGZHOU WANG LAO JI GREAT
HEALTH ENTERPRISE DEVELOPMENT CO.,
LTD. (AKA WLJ GREAT HEALTH
ENTERPRISES DEVELOPMENT CO., LTD.);
Defendants.

Civil Action No. 1:20-cv-07397-LJL

**DECLARATION OF WEI ZHANG
IN SUPPORT OF PLAINTIFF
MULTI ACCESS LIMITED'S
MOTION FOR ALTERNATIVE
SERVICE**

----- X

Wei Zhang, Ph.D., hereby declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a technical specialist with the law firm McCarter & English, LLP, attorneys for plaintiff Multi Access Limited ("MAL"), in the above matter. Mandarin is my native language and I can read Simplified Chinese characters and some traditional Chinese characters.
2. I submit this Declaration in support of MAL's Motion for Alternative Service. If called upon as a witness, I could testify as to all facts set forth in this declaration from either my own personal knowledge or from my review of records and documents maintained by McCarter & English.
3. MAL, through McCarter & English, LLP, retained DGR Legal to serve summonses and complaints on the following defendants, who are located in China, in this proceeding (collectively, the "Great Health Defendants"), pursuant to the Hague Convention:
 - a. Guangzhou Wang Lao Ji Great Health Industry Co., Ltd. (a/k/a WLJ Great Health Industry Co., Ltd.) 106, No. 3, Shuangshan Avenue, Nansha District, Guangzhou, People's Republic of China;

- b. Guangzhou Wang Lao Ji Great Health Enterprise Development Co., Ltd. (a/k/a WLJ Great Health Enterprises Development Co., Ltd.) 106, No. 3, Shuangshan, Avenue, Nansha District, Guangzhou, People's Republic of China.

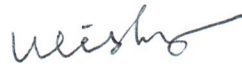
4. In April 2022, McCarter & English provided DGR Legal with the Amended Complaint and Court issued Summons ("Service Documents"), for service upon multiple defendants located in China, including the Great Health Defendants. To conform with the requirements of the Hague Convention and Chinese law, DGR Legal translated the Service Documents into Simplified Chinese characters.

5. On October 26, 2022, Requests of Service Abroad of Judicial or Extrajudicial Documents ("Judicial Requests") were prepared as required by Chinese law to serve the Great Health Defendants via the Hague Convention.

6. My understanding is that the Chinese Ministry of Justice rejected service of process on the Great Health Defendants because there were purported discrepancies between the English version of the Great Health Defendants' names and the Simplified Chinese translations on the Summonses and Requests. My examination of these documents revealed that the discrepancies were very minor, namely, the Chinese translation of [广州王老吉大健康产业有限公司] Guangzhou Wang Lao Ji Great Health **Industry** Co., Ltd. was used for [广州王老吉大健康企业发展有限公司] Guangzhou Wang Lao Ji Great Health **Enterprise Development** Co., Ltd., and vice versa.

7. To the best of my knowledge, the difference between [产业] (**Industry**) and [企业] (**Enterprise**) is not substantive to a native speaker.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 10, 2023.

A handwritten signature in black ink, appearing to read 'Wei Zhang', is positioned above a horizontal line.

Wei Zhang, Ph.D.